

**VIA ECFS &
VIA E-MAIL**

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

Re: Notice of Ex Parte Presentation, ET Docket No. 15-26

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Federal Communications Commission's ("FCC") rules, 47 C.F.R. § 1.1206, General Motors Company. ("GM"), by its attorneys, hereby submits this letter summarizing three *ex parte* meetings in the above-referenced docket.

On June 29, 2017, Harry Lightsey, Richard Lopez, Jeff Stefan (by telephone) of GM and Scott Delacourt of Wiley Rein, LLP, counsel to GM, met with Daudeline Meme, Legal Advisor, Office of Commissioner Mignon Clyburn. On June 30, 2017, Richard Lopez, Luke Simon (by telephone) and Jeff Stefan (by telephone) of GM and Melinda Lewis of The Fritts Group, consultant to GM met with Erin McGrath, Legal Advisor, Office of Commissioner Michael O'Rielly. Also on June 30, 2017, Andy York, Rich Lopez, Luke Simon (by telephone) and Jeff Stefan (by telephone) of GM met with Rachel Bender, Wireless and International Advisor, Office of Chairman Pai.

The parties discussed the importance of short range radars to the future of vehicle automation and GM's support for the draft Order in the above-captioned docket which would open the 76-81 GHz band for use by such radars. The parties also discussed GM's desire for the Order to be clarified regarding operation of the January 1, 2022 sunset impacting 24 GHz radars. Specifically, GM requested that the Order be clarified to reflect that 24 GHz radars installed in vehicles sold before the sunset may be repaired and replaced for the life of the vehicle. GM explained that the ability to repair and replace potentially malfunctioning or defective equipment is required for GM to comply with its obligations under the National Traffic and Motor Safety Act of 1996 and the Fixing American's Surface Transportation Act. Moreover, the ability to repair and replace 24 GHz radars for the life of the vehicle will ensure that consumers purchasing vehicles using such radars before the sunset will not lose access to important vehicle safety features.

To effectuate this change, GM proposed revising the rules accompanying the draft order as shown in bold below:

§ 15.37 Transition provision for compliance with the rules.

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(l) The certification of wideband vehicular radars designed to operate in the 23.12-29 GHz band under § 15.252 and ultra-wideband vehicular radars designed to operate in the 22-29 GHz band under § 15.515 of the rules shall not be permitted on or after [INSERT DATE ONE YEAR AFTER DATE OF FEDERAL REGISTER PUBLICATION].

(m) The manufacture, importation, marketing, sale, and installation of wideband or ultra-wideband vehicular radars that are designed to operate in the 23.12-29 GHz band under § 15.252 and in the 22-29 GHz band under § 15.515 of the rules shall not be permitted after January 1, 2022. **Notwithstanding the foregoing, the manufacture, importation, marketing, sale, and installation of wideband or ultra-wideband vehicular radars that are designed to operate in the 23.12-29 GHz band under § 15.252 or in the 22-29 GHz band under § 15.515 of the rules are authorized on or after January 1, 2022 for the purposes of repairing or replacing such radar installed in a vehicle on or before January 1, 2022 that is either defective, damaged or malfunctioning, included within a vehicle service procedure, or subject to a product recall whether voluntary or pursuant to a legal obligation under the National Traffic and Motor Vehicle Safety Act, 49 U.S.C. § 301 et. seq.**

(n) Wideband or ultra-wideband vehicular radars operating in the 23.12-29 GHz band under § 15.252 and/or in the 22-29 GHz band under § 15.515 of the rules that are already installed or in use may continue to operate in accordance with their previously obtained certification. Class II permissive changes for such equipment shall not be permitted after January 1, 2022. **Notwithstanding the foregoing, Class II permissive changes to wideband or ultra-wideband vehicular radars that are designed to operate in the 23.12-29 GHz band under § 15.252 or in the 22-29 GHz band under § 15.515 of the rules are authorized on or after January 1, 2022 for the purposes of repairing or replacing such radar installed in a vehicle on or before January 1, 2022 that is either defective, damaged or malfunctioning, included within a vehicle service procedure, or subject to a product recall whether voluntary or pursuant to a legal obligation under the National Traffic and Motor Vehicle Safety Act, 49 U.S.C. § 301 et. seq.**

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Please direct any questions to the undersigned.

Respectfully,



Richard F. Lopez
Director, Federal and Administration Affairs
General Motors North America

cc (via email): Nicholas Degani
Erin McGrath
Daudeline Meme